



**US Army Corps of Engineers
Sacramento District
Engineering Division –Geology Section**

October 2011

TO: Carl Warren – LUST Tribal Supervisor
CC: Scott Ruth (PM Bristol Environmental Remediation Services, LCC)
Curtis Payton (USACE)
FROM: Christy Leonard (USACE)
SUBJECT: Comments on “Technical Memorandum for Bond and Bond Site NAV 46 August 2011 Groundwater Sampling Results and August 2011 Installation of Oxygen Emitters”, Prepared for EPA Region IX by Bristol Environmental Remediation Services, LCC, Dated September 2011.

The following comments address the position of SFO program in support of EPA’s Tribal UST program goals specific emphasis on hazardous/toxic waste concerns at the site.

Specific Comments:

1. Page 4 paragraph 1, can destroyed MW-16 be repaired?
2. Page 4 paragraph 2, add that concentrations of DRO increased in MW-7, 8, 9, and 15 since the December 2010 sampling event.
3. Page 4 paragraph 2, add that the concentration of GRO decreased in MW-9 since the December 2010 sampling event.
4. Page 4 paragraph 2, MW-11 was not detected over the MCL for DRO, remove from list.
5. Page 4 paragraph 3, include the depth each oxygen emitter was suspended in the water column.
6. Page 4 paragraph 3, include the rate oxygen was emitted into groundwater.
7. Page 5 paragraph 2 under section Subsurface Soil, include the depth of the zone for contaminated soil to the first sentence.
8. Quarterly groundwater monitoring should be added to the 2012 groundwater sampling schedule. Include, “Quarterly groundwater sampling will be needed to determine if oxygen emitters are effective.” Remove the language stating that groundwater sampling will be evaluated following the Risk Assessment.
9. In Schedule Summary add the tentative date for the next sampling event.

General Comments:

1. Is NAPL being removed in MW-1 and MW-10 at the GW sampling events?